

June 7, 2021

## VIA ECF

Honorable Vincent L. Briccetti United States District Judge United States District Court Southern District of New York 300 Quarropas Street White Plains, New York 10601

Re: Bd. of Managers of the Landing at Dobbs Ferry v. Village of Dobbs Ferry

Docket No.: 21-CV-4916 (VB)

Dear Judge Briccetti:

We represent the Defendant Village of Dobbs Ferry ("the Village") in the above-referenced matter. We are writing to request an extension of time to respond to the Complaint. This is our first such request.

The Plaintiff filed its Complaint in Westchester Supreme Court on May 18, 2021. The Village removed this action to this Court on June 3, 2021. Thus, the Village's current deadline to respond to the Complaint is June 10, 2021. However, we require some additional time to evaluate the Complaint and determine and prepare an appropriate response. We have conferred with the Plaintiff's counsel and he consents to the extension. Plaintiff's consent to this extension of time is not a waiver the Plaintiff's right to object to the jurisdiction of this Court based on its contention that the removal was untimely, as set forth more fully in its June 4, 2021 letter to the Court.

Accordingly, we respectfully request that the Village's time to answer, appear, or otherwise move with respect to the Complaint be extended to July 8, 2021.

Respectfully Submitted,

SILVERMAN & ASSOCIATES

Caroline B. Lineen

TO: VIA ECF

Braverman Greenspun, P.C. Attorneys for Plaintiff Attn: John Kolbrener, Esq.